REMARKS

Amendments have been presented to claims 30 and 35; claims 33 and 37 have been cancelled without prejudice; and claims 38-41 have been added. Support for these amendments and added claims is found throughout the original specification, no new matter has been added.

It is clear that, as amended, claim 30 is patentable over previously cited articles including, but not limited to, Ogata et al. (U.S. Patent No. 6,733,243) (hereinafter "Ogata").

For example, amended Claim 30 recites a system comprising:

> a user interface configured to receive an identification of a lot to be processed on a process machine;
>
> a plurality of stockers, each having a respective closeness to the process machine that is within a predetermined threshold closeness; and
>
> an engine coupled to the user interface and configured
>
> > to receive closeness information on each of the plurality of stockers,
> >
> > to determine if the lot is located outside of the predetermined threshold closeness, and
> >
> > to generate staging instructions to move the lot to a selected one of the plurality of stockers based at least in part on said determining if the lot is located outside of the first closeness, received closeness information and relative utilization of the plurality of stockers.

Ogata fails to teach or fairly suggest an engine "to receive closeness information on each of the plurality of stockers" as recited in claim 30, for example.

Referring to Figure 5, and associated discussion in column 8, lines 5-14, Ogata discloses a system where a pod, after it is finished with a first process machine 11 and subsequently stored in stocker 10, is sent to a stocker 50 associated with a second process machine 53. If, however, the stocker 50 is full, the pod will be transported to a buffer stocker 70. Once the stocker 50 opens up, the pod will be sent from the buffer stocker 70 to the stocker 50.

There is no staging engine in Ogata that receives information about how close stockers 50 and 70 are to the second process machine 53, it simply knows that stocker 70 is the designated overflow stocker to be used if the target stocker 50 is full.

Furthermore, because there is no staging engine that receives closeness information, it must follow that Ogata cannot base its staging instructions, at least in part, on said information.

For at least these reasons, the Applicants respectfully submit that Claim 30 is patentable over Ogata. Furthermore, claims 31-32, 34-36 and 38-41 depend from, or include similar limitations to, claim 30 and are therefore patentable for at least the reasons given above.

Claims 39 and 41, for example, present additional points of patentability such as, but not limited to, generating staging instructions to substantially uniformly distribute any of a plurality of lots determined to be outside of the predetermined threshold closeness over at least a subset of the plurality of stockers (located within the predetermined threshold closeness).

CONCLUSION

In view of the foregoing, the Applicant respectfully submits that claims 30-32, 34-36 and 38-41 are in condition for allowance. Thus, early issuance of Notice of Allowance is respectfully requested.

If the Examiner has any questions, he is invited to contact the undersigned at (503) 796-2972.

The Commissioner is hereby authorized to charge shortages or credit overpayments to Deposit Account No. 500393.

Respectfully submitted,
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Dated: 2/8/06

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